

Orange Unified School District

Heat Illness Prevention Plan

CCR Title 8, § 3395 and 3396



**Risk Management
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Responsibility

All managers and supervisors, under the direction of the Director of Risk Management, are responsible for implementing the applicable provisions of this Heat Illness Prevention Program within their assigned work areas. Managers and supervisors are responsible for communicating applicable procedures to employees, supporting implementation of appropriate preventive measures, and taking reasonable steps to address identified heat-related hazards.

All workers are responsible for following safe work practices and applicable District directives, policies, and procedures; using required protective measures; and promptly reporting heat-related concerns, hazards, or symptoms to their supervisor or other designated District representative.

This Heat Illness Prevention Program combines the District's existing Heat Illness Prevention Program, implemented in October 2013, with the Indoor Heat Illness Prevention Program required effective in the 2024–2025 school year. Following consultation with managers responsible for employees who may be exposed to indoor heat hazards, the combined Program was revised and reissued on September 23, 2025.

This Program is maintained by Risk Management and is available electronically through the District's website. A copy will also be made available to employees or their representatives upon request.

Procedures for the Provision of Water:

1. Fresh, pure, suitably cool water will be provided to workers free of charge. Water will be located as close as practicable to areas where employees are working.
2. Supervisors will ensure that the water is fresh, pure, and suitably cool. All water containers will be kept in sanitary condition. During hot weather or high indoor heat conditions, the water will be cooler than the ambient temperature, but not so cool as to cause discomfort.

Procedures for Access to Cool-Down Areas for Indoor Places of Employment

1. Cool-down areas will be located at offices, school buildings, or other buildings with air conditioning. The temperature in the indoor cool-down areas will be maintained at less than 82 degrees Fahrenheit by monitoring the building automation system.
2. Workers will be informed of the location of the cool-down area(s) and will be encouraged and allowed to take cool-down breaks in the cool-down area(s) whenever they feel they need a break.
3. A worker who takes a preventative cool-down rest break will be monitored and asked if they are experiencing symptoms of heat illness. In no case will the worker be ordered back to work until signs or symptoms of heat illness have abated (see the section on Emergency Response for additional information).
4. If a worker exhibits signs or symptoms of heat illness while on a preventative cool-down rest, then appropriate first aid or emergency response will be provided. Preventative cool-down rest periods will be at least 5 minutes, in addition to the time needed to access the cool-down area.

Procedures for Access to Shade for Outdoor Places of Employment

1. Shade will be as close as practicable to the workers when the outdoor temperature equals or exceeds 80 degrees Fahrenheit. When the temperature is below 80 degrees Fahrenheit, access to shade will be promptly provided, when requested by a worker.

Note: The interior of a vehicle will not be used to provide shade unless the vehicle has a working air conditioner and is cooled down ahead of time.

2. Enough shade will be available at the site to accommodate all of the workers who are on a break at any point in time. During meal periods, there will be enough shade for all workers who choose to remain in the general area of work or in areas designated for recovery and rest periods.
3. To ensure that the provided shade will be enough, we will rotate workers in and out of

breaks, including meal periods, and recovery and rest periods, if the number of workers in a crew is higher than the number that can fit comfortably under the shade.

4. A worker who takes a preventative cool-down rest break will be monitored, encouraged to remain in the shade, and asked if they are experiencing symptoms of heat illness.
5. In no case will the worker be ordered back to work until signs and symptoms of heat illness have abated, and in no event less than 5 minutes in addition to the time needed to access the shade. See the section on Emergency Response for additional information.

Procedures for Temperature Assessment for Indoor Places of Employment

1. The District will establish reasonable procedures for assessing indoor work areas when environmental conditions indicate that employees may be exposed to a risk of heat illness. Temperature assessments may be conducted using available building, facility, environmental, or other appropriate temperature information, supplemented by direct measurement when warranted.
2. Temperature assessments will be prioritized for indoor work areas where heat may reasonably be expected to present a risk to employees, including areas affected by outdoor temperatures, inadequate or non-functioning air conditioning, high radiant heat sources, heat-generating equipment or processes, restricted airflow, or other environmental conditions.
3. When direct measurement is required, temperature will be measured using an appropriate thermometer that is freely exposed to the air, shielded from radiant heat sources, and located in the immediate area where employees are working.
4. For indoor work areas subject to the assessment and control requirements of Title 8, Section 3396, the District will measure and record the temperature and heat index, recording whichever is greater, when required by the regulation. Measurements will be taken initially when it is reasonable to suspect that the applicable regulatory conditions exist and at times when employee exposure is expected to be greatest. Additional measurements will be taken when conditions are reasonably expected to be 10 degrees Fahrenheit or more above the previous measurement.
5. Because indoor environmental conditions can vary substantially among District facilities and work areas, temperature assessment and response measures may be implemented based on the conditions of the particular work area, the nature and duration of the work, employee workload, clothing or personal protective equipment, radiant heat, ventilation, humidity, and other relevant environmental risk factors.

6. Employees are encouraged to promptly notify their supervisor or other designated District representative when they believe indoor conditions may create a risk of heat illness or when they experience signs or symptoms of heat illness. Reports will be evaluated and, when appropriate, additional temperature or heat-index measurements and control measures will be implemented.
7. When assessment identifies conditions requiring action under Title 8, Section 3396, the District will implement feasible engineering controls, administrative controls, and, when required, personal heat-protective equipment to minimize the risk of heat illness. Engineering controls may include increasing ventilation or air movement, reducing exposure to radiant heat, or other feasible measures appropriate to the work area.
8. When measurements are required by Title 8, Section 3396, records will include the date, time, and specific location of the measurement and will be retained in accordance with the regulation.
9. Supervisors and site administrators should coordinate with Facilities/Maintenance and Operations when building-related conditions, including HVAC performance, ventilation, or other facility conditions, may contribute to elevated indoor temperatures. Nothing in these procedures prevents the District from taking interim measures to protect employees while building conditions are being evaluated or corrected.

Procedures for Monitoring the Weather for Outdoor Places of Employment

1. The District will monitor weather conditions that may reasonably be expected to create a risk of heat illness for employees working outdoors. Weather information may be obtained through reliable sources, including the National Weather Service, local weather services, District resources, or other reliable weather-monitoring sources.
2. Weather conditions may be monitored centrally, at the worksite, or through a combination of District and site-level resources, depending on the nature, location, duration, and anticipated conditions of the work.
3. Weather forecasts should be reviewed sufficiently in advance to identify anticipated periods of elevated temperatures, heat waves, or other conditions that may increase the risk of heat illness. When elevated temperatures or other environmental conditions are anticipated, supervisors and designated District personnel should consider appropriate preventive measures.

4. Because conditions may vary by location and throughout the workday, forecast information may be supplemented by actual temperature observations or measurements at the worksite when appropriate.
5. When a heat wave is anticipated, supervisors or designated District personnel will review the applicable weather information and implement appropriate acclimatization, observation, communication, and other preventive measures consistent with the District's Heat Illness Prevention Plan. A heat wave is a day when the predicted high temperature is at least 80°F **and** at least 10°F higher than the average high daily temperature during the preceding five days.
6. Supervisors and designated District personnel will communicate anticipated heat conditions and applicable preventive measures to employees as reasonably necessary. Communication methods may include in-person communication, electronic communication, safety briefings, or other effective methods appropriate to the work location.
7. Employees are encouraged to promptly report unusually hot conditions, changes in weather conditions, concerns regarding access to water or shade, or signs or symptoms of heat illness to their supervisor or other designated District representative. Employees may request a preventative cool-down rest when they feel the need to protect themselves from overheating.

Procedures for Control Measures for Indoor Places of Employment

1. Feasible engineering controls will be implemented first to reduce the temperature and heat index to below 87°F (or temperature to below 82°F for employees working in clothing that restricts heat removal [such as impermeable protective clothing, or multiple layers of required PPE] or working in high-radiant-heat areas [such as areas near operating ovens, boilers, welding operations, or other significant heat-producing equipment]).
2. Administrative controls will be added if feasible engineering controls are not enough to comply with the standard.
3. The following engineering controls will be implemented to lower the indoor temperature, heat index, or both to the lowest possible level. These controls help make the work environment cooler or create a barrier between the worker and the heat where there is no air conditioning present:
 - Cooling fans
 - Increased natural ventilation, such as open windows and doors when the outdoor temperature or heat index is lower than the indoor temperature and heat index
 - Minimize or eliminate use of ovens and warming cabinets in kitchens to reduce heat exposure

4. The following administrative controls will be implemented for when feasible engineering controls have been implemented. These controls are modified work practices that can reduce heat exposure by adjusting work procedures, practices, or schedules:
 - Require mandatory rest breaks in a cooler environment. The duration of the rest breaks should increase as heat stress rises.
 - When feasible, relocate the employee to work from a cooler location.
5. The following personal heat-protective equipment will be provided if feasible engineering controls do not decrease the temperature enough and administrative controls do not minimize the risk of heat illness. This personal heat-protective equipment consists of special cooling devices that the worker wears on their body that can protect them in hot environments:
 - Neck wraps
 - Cooling jackets

Procedures for Acclimatization for Indoor and Outdoor Place of Employment:

Acclimatization is the temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. The body needs time to adapt when temperatures rise suddenly, and a worker risks heat illness by not taking it easy when a heat wave or heat spike strikes, or when starting a new job that exposes the worker to heat to which the worker's body hasn't yet adjusted. The following are additional protective procedures that will be implemented when conditions result in sudden exposure to heat that workers are not accustomed to.

1. The weather will be monitored daily. The supervisor will be on the lookout for heat waves, heat spikes, or temperatures to which workers haven't been exposed for several weeks or longer.
2. New workers and those who have been newly assigned to a high-heat area will be closely observed by the supervisor or designee for the first 14 days.
3. New For indoor work areas, this 14-day observation period applies when the temperature or heat index equals to or exceeds 87-degree Fahrenheit, or when the temperature or heat index equals or exceeds 82 degrees Fahrenheit when a work wears clothing that restricts heat removal or when a worker works in a high radiant heat area.
4. Workers and supervisors will be trained in the importance of acclimatization, how it is developed, and how these company procedures address it.

Procedures for Emergency Response for Indoor and Outdoor Place of Employment:

1. Effective means of bringing emergency services to the worker in need, or the worker in need of emergency services will be ensured by:
 - A. For outdoor places of employment, a worker will be directed to the access gate in order to direct emergency services to avoid a delay of bringing emergency medical services to the worker in need.
 - B. For indoor places of employment, a worker will be directed to the access gate in order to direct emergency services to avoid a delay of bringing emergency medical services to the worker in need.
2. Determinations will be made if there is a language barrier present in the workplace that might inhibit the calling of emergency services. The following will be the measures taken to ensure emergency services can be promptly called by designating the English-speaking lead. To ensure that emergency medical services can be called, all supervisors will have access to a landline located in front office of the school or carry a cell phone.
3. When a worker shows signs or symptoms of severe heat illness, emergency medical services will be called, and steps will immediately be taken to keep the stricken worker cool and comfortable to prevent the progression to more serious illness. Under no circumstances will the affected worker be left unattended.
4. During a heat wave, heat spike, or hot temperatures, workers will be reminded and encouraged to immediately report to their supervisor any signs or symptoms they are experiencing.
5. Workers and supervisors will be trained in these procedures for emergency response.

Procedures for Handling a Sick Worker:

1. When a worker displays possible signs or symptoms of heat illness, a trained first aid employee or supervisor will evaluate the sick worker and determine whether resting in shade or cool-down area and drinking cool water will suffice or if emergency service providers will need to be called. A sick worker will not be left alone in the shade or cool-down area, as their condition could take a turn for the worse.
2. When a worker displays possible signs or symptoms of heat illness and no trained first aid employee or supervisor is available at the site, emergency service providers will be immediately called by the staff member observing signs or symptoms of severe heat illness.
3. Emergency service providers will be called immediately if a worker displays signs or symptoms of severe heat illness (e.g., decreased level of consciousness, staggering, vomiting, disorientation, irrational behavior, incoherent speech, convulsions, red and hot face), does not look okay, or does not get better after drinking cool water and resting in the shade. While the ambulance is en route, first aid will be initiated (e.g., cool the worker

by placing the worker in the shade, removing excess layers of clothing, placing ice packs in the armpits and groin area, and fan the victim). Sick workers will not go home without being cleared of heat illness by emergency service providers.

Procedures for Worker and Supervisor Training:

The District will provide heat illness prevention training to supervisory and non-supervisory employees before they begin work that should reasonably be anticipated to result in exposure to the risk of heat illness. Training will be conducted via Keenan SafeSchool online training platform.

Training will be provided in a manner and language that employees can understand and may be incorporated into existing District safety training programs, as appropriate.

Training for supervisory and non-supervisory employees will address, as applicable to the employee's work environment:

- a. Environmental and personal risk factors for heat illness;
- b. The District's procedures for providing and accessing water, shade or other applicable cooling measures, preventative cool-down rests, and first aid;
- c. The importance of frequently consuming small quantities of water when working in hot conditions and likely to be sweating more than usual;
- d. The concept and importance of acclimatization;
- e. The types of heat illness and their common signs and symptoms;
- f. The importance of immediately reporting signs or symptoms of heat illness in themselves or co-workers;
- g. The District's procedures for responding to signs or symptoms of possible heat illness, including when and how emergency medical services will be obtained;
- h. The District's procedures for contacting emergency medical services and, when necessary, transporting an employee to a location where emergency medical services can reach the employee;
- i. The District's procedures for providing clear and precise directions to the work location for emergency responders.

The District will maintain documentation of required heat illness prevention training consistent with applicable District recordkeeping requirements and applicable law.